

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GREGORY BOUTCHARD and SYNOVA
ASSET MANAGEMENT, LLC, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

KAMALDEEP GANDHI, YUCHUN
MAO a/k/a BRUCE MAO, KRISHNA
MOHAN, TOWER RESEARCH CAPITAL
LLC, and JOHN DOE Nos. 1 – 5,

Defendants.

Case No.: 1:18-cv-07041

Hon. John J. Tharp, Jr.

**CLASS PLAINTIFFS' MOTION FOR EXCESS PAGES FOR THEIR MEMORANDUM
OF LAW IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT WITH TOWER RESEARCH CAPITAL LLC**

Plaintiffs Gregory Boutchard and Synova Asset Management, LLC (collectively, “Class Plaintiffs”) respectfully move this Court for excess pages for their memorandum of law in support of preliminary approval of their class action settlement with Defendant Tower Research Capital LLC (“Tower”). In support of this motion, Class Plaintiffs state as follows:

1. On January 25, 2021 the Court ordered (1) Class Plaintiffs to file their motion for preliminary approval by January 29, 2021, (2) that any objections are due no later than February 19, 2021, and (3) a telephonic status hearing remains scheduled for February 25, 2021 at 10 a.m.

2. To fully address the arguments relating to preliminary approval of the Settlement, Class Plaintiffs seek leave to file a 30 page memorandum in support of their motion for preliminary approval, which is in excess of the 15-page limit set forth in Local Rule 7.1. Plaintiffs believe 30 pages would allow them to address as issues in way that is concise and does not prejudice Class Plaintiffs and the Class.

3. Class Plaintiffs have contacted Tower regarding this motion. Tower consents to the relief sought herein.

WHEREFORE, Class Plaintiffs respectfully move this Court for an Order granting Class Plaintiffs leave to file a 30-page memorandum in support of their motion for preliminary approval.

Respectfully submitted,

Dated: January 29, 2021
White Plains, New York

LOWEY DANNENBERG, P.C.

/s/ Vincent Briganti
Vincent Briganti
Raymond P. Girnys
Johnathan P. Seredynski
44 South Broadway
White Plains, NY 10601
Tel.: (914) 997-0500
Fax: (914) 997-0035
Email: vbriganti@lowey.com
rgirnys@lowey.com
jseredynski@lowey.com

Lead Counsel for Plaintiffs

Anthony F. Fata
Jennifer W. Sprengel
Brian O'Connell
**CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP**
150 S. Wacker, Suite 3000
Chicago, IL 60606
Tel.: (312) 782-4880
Fax: (312) 782-4485
Email: afata@caffertyclobes.com
jsprengel@caffertyclobes.com
boconnell@caffertyclobes.com

Additional Counsel for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on the date shown below he caused the CLASS PLAINTIFFS' MOTION FOR EXCESS PAGES FOR THEIR MEMORANDUM OF LAW IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT WITH TOWER RESEARCH CAPITAL LLC to be electronically filed with the Clerk for the U.S. District Court for the Northern District of Illinois, which will send a notification and a copy of the document to all counsel of record.

Dated: January 29, 2021

/s/ Vincent Briganti
Counsel for Plaintiffs